UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

NETSPHERE, INC.	§
MANILA INDUSTRIES, INC.; and	§
MUNISH KRISHAN	§
	§
Plaintiffs,	§ CIVIL ACTION NO. 3-09CV0988-F
vs.	§
	§
JEFFREY BARON and	
ONDOVA LIMITED COMPANY,	§
	§
Defendants.	§

DEFENDANTS' MOTION TO APPROVE NEW BANKRUPTCY COUNSEL FOR ONDOVA LIMITED COMPANY

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COME NOW, Jeffrey Baron ("Baron") and Ondova Limited Company ("Ondova") (Baron and Ondova are collectively referred to as "Defendants") and file this Motion to Approve New Bankruptcy Counsel for Ondova Limited Company, and for cause would respectfully show unto the Court as follows:

T.

As a result of the Court's concerns that Defendants have changed counsel as a tactic to delay proceedings, the Court ordered that Friedman & Feiger, L.L.P. was lead counsel for Defendants and that Defendants must first obtain approval from this Court to employ new or additional counsel. Unbeknownst to Friedman & Feiger, L.L.P., Jay Kline, Jr., Esq. hired E. P. Keiffer, Esq. with the law firm of Wright Ginsberg Brusilow, P.C. to put Ondova into bankruptcy. Since putting Ondova into bankruptcy, Ondova's bankruptcy counsel has been secretive, uncooperative, uncommunicative and hostile towards Friedman & Feiger, L.L.P. and it is unclear that they have even been acting in Ondova's best interests. Defendants would like to now change Ondova's bankruptcy counsel so that all counsel can work harmoniously towards a unified goal.

II.

Defendants would like approval to employ Gerrit M. Pronske, Esq. with the law firm of Pronske & Patel, P.C. as Ondova's new bankruptcy counsel. Pronske & Patel, P.C. are highly regarded bankruptcy litigators with experience in handling complex bankruptcy matters. Friedman & Feiger, L.L.P. has an excellent working relationship with Pronske & Patel, P.C. and were involved in the process of choosing substitute bankruptcy counsel. This change in bankruptcy counsel will enable Defendants' bankruptcy and litigation counsel to work together towards a unified goal. This change is not sought for purposes of delay but to ensure that justice is served.

WHEREFOR PREMISES CONSIDERED, Jeffrey Baron and Ondova Limited Company respectfully pray that the Court approve hiring Pronske & Patel, P.C. as Ondova's new bankruptcy counsel; and, for such other and further relief, both general and special, at law and in equity, to which Defendants may be justly entitled.

Dated: September 1, 2009

Respectfully submitted,

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COUNSEL FOR DEFENDANTS JEFFREY BARON AND ONDOVA LIMITED COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2009, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court for the Northern District of Texas, Dallas Division, using the electronic case filing system of the Court. The electronic case filing system will send a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept the Notice as service of this document by electronic means:

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